

ROBERT M. SEINES
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UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

VS.

JODY L. WALLETTE,

Defendant.

Case No. 2:23-CR-22-RMP

MOTION TO CONTINUE
PRETRIAL CONFERENCE
AND JURY TRIAL

COMES NOW the defendant, JODY L. WALLETTE, by and through his

attorney, Robert M. Seines, and moves the Court for an order continuing the pretrial conference and jury trial dates. This motion is based on the court file and the annexed declaration of counsel.

RESPECTFULLY SUBMITTED this 25th day of April, 2023.

By: /s/ Robert M. Seines
Robert M. Seines, WSBA No. 16046
Attorney for Jody L. Wallette

**MOTION AND DECLARATION TO
CONTINUE PRETRIAL CONFERENCE
AND JURY TRIAL**

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DECLARATION OF COUNSEL

2 I, Robert M. Seines, hereby declare under the penalty of perjury pursuant
3 to the laws of the State of Washington, that the following is true and correct:
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5 1. I am the attorney for defendant, JODY L. WALLETTE I was
6 appointed on March 20, 2023 A pretrial conference and motion hearing is set for
7 May 16, 2023. The jury trial date is May 30, 2023. The motions deadline is
8 April 25, 2023.

9 2. I need additional time to assimilate the information contained in the
10 discovery in this case to determine issues that need to be researched, and to
11 prepare and file appropriate motions.

12 Given the nature of this case and the penalties Mr. Wallette is facing, the
13 interests of justice will be best served by continuing the trial. A thorough review
14 of the discovery and research must be completed before Mr. Wallette will have
15 sufficient information to make informed decisions relating to his case. Counsel
16 cannot adequately or fully advise Mr. Wallette on matters pertaining to trial
17 without further investigation, research, and discussions.

18 Here, counsel has worked diligently to defend Mr. Wallette but needs
19 more time to adequately prepare his defense.

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3. Mr. Wallette agrees with this continuance after having been advised of his speedy trial rights. I have not yet conferred with AUSA Caitlin Baunsgard.

FOR THE FOREGOING REASONS, Jody L. Wallette respectfully requests that this Court grant his motion to extend the current deadlines for a period of at least sixty (60) days.

Signed this 25th day of April, 2023 at Spokane, Washington.

/s/ Robert M. Seines
ROBERT M. SEINES, WSBA 16046
Attorney for Defendant, Jody L. Wallette

CERTIFICATE OF SERVICE

I hereby certify that on April 25, 2023 I electronically filed the foregoing with the Clerk of Court using the CM/ECF System which will send notification of such to: Caitlin Baunsgard, Assistant U.S. Attorney

/s/ Robert M. Seines
ROBERT M. SEINES, WSBA 16046
Attorney for Defendant, Jody L. Wallette

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